

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

Crim. No. 04-30046-MAP


ALBERT INNARELLI, ET AL,  
DEFENDANTS

**MOTION OF DEFENDANT MICHAEL BERGDOLL  
TO MODIFY CONDITIONS OF RELEASE**

Now comes the Defendant Michael Bergdoll and moves that the conditions of his pre-sentencing release restricting his travel to Commonwealth of Massachusetts and the State of Connecticut be modified.

The Defendant seeks permission to travel to Hampton Beach, New Hampshire with family. This trip will occur from September 8 - 10, 2006, and the Defendant and his family will be staying at The Ashworth Hotel, 295 Ocean Boulevard, Hampton Beach, New Hampshire. The telephone number for the hotel is 800-345-6736. The defendant can remain in telephone contact with pre-trial services if necessary.

The Defendant  
Michael Bergdoll  
By his attorney



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